

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ACADEMY OF MOTION PICTURES  
ARTS AND SCIENCES, a California  
non-profit corporation,

Plaintiff,

v.

AMPAS.COM, an Internet domain name,

Defendant.

Civil Action No. 1:07-cv-356-LMB-LO

**DECLARATION OF MAUREEN E. CARR IN SUPPORT OF  
PLAINTIFF'S MOTION FOR AN ORDER TO PUBLISH NOTICE OF ACTION**

I, Maureen E. Carr, declare as follows:

1. I am a member of the bar of the Commonwealth of Virginia and am associated with the law firm Rees Broome, PC, counsel for Plaintiff ACADEMY OF MOTION PICTURES ARTS AND SCIENCES ("Plaintiff").

2. On August 10, 2005, a letter was sent on behalf of Plaintiff to the registrant of the domain name AMPAS.COM (the "Domain Name"), notifying the registrant that use of the Domain Name infringed Plaintiff's famous trademark and trade name A.M.P.A.S.®. The letter requested, among other things, that the registrant transfer the Domain Name registration to Plaintiff, halt construction of any and all websites incorporating Plaintiff's marks, and refrain from registering or using Plaintiff's trademarks. The letter further notified the registrant that if he failed to comply with Plaintiff's requests, Plaintiff would have no choice but to pursue its legal remedies, including those under the Anticybersquatting Consumer Protection Act of 1999,

15 U.S.C. § 1125(d). A true and accurate copy of this demand letter is attached hereto as

**Exhibit A.**

3. The demand letter was sent to the registrant of the Domain Name at the postal and email addresses provided by the registrant to the registrar of <ampas.com>: Lin ZanSong, 1688 RM RD., Wenzhou, Zhejiang, China 325000, master@21cn.net. A true and accurate copy of the DomainTools Whois database record for the defendant Domain Name is attached hereto as

**Exhibit B.**

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: June 5, 2007

\_\_\_\_\_/s/  
Maureen E. Carr

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was filed with the Clerk of the Court using the CM/ECF system, and that a copy was served via Federal Express and email on the registrant of the defendant domain name, which is a non-filing user, at the postal and email addresses set forth below:

Lin ZanSong  
1688 RM RD.  
Wenzhou, Zhejiang  
China 325000  
Email: master@21cn.net

this 5th day of June, 2007.

\_\_\_\_\_/s/\_\_\_\_\_  
Maureen E. Carr  
Virginia State Bar No. 72802  
Counsel for Academy of Motion Pictures  
Arts and Sciences  
REES BROOME, PC  
8133 Leesburg Pike, Ninth Floor  
Vienna, Virginia 22182  
(703) 790-1911 (phone)  
(703) 790-5249 (fax)  
mcarr@reesbroome.com